

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUTTES

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,
et al.,

Defendants.

Civil Action No. 25-11042-MJJ

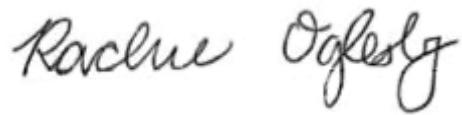
DECLARATION OF RACHEL OGLESBY

1. My name is Rachel Oglesby. I make this Declaration based on my own personal knowledge, on information contained in the records of the Department of Education, or on information provided to me by Department of Education employees.
2. I am currently employed as Chief of Staff for the U.S. Department of Education, headquartered in Washington, D.C. I began my service at the Department on January 20, 2025.
3. Before joining the Department, I worked at America First Policy Institute as the Chief State Action Officer and Director of the Center for the American Worker.
4. In my role at the Department, I have the following responsibilities:
 - a. I assist the Secretary of Education with all her responsibilities running the Department.
 - b. I advise the Secretary on significant matters within and affecting the Department.
5. I submitted declarations in the cases of *New York v. McMahon*, Case No. 25-10601-MJJ and *Somerville Public Schools v. Trump*, Case No. No. 25-10677-MJJ, on June 3, 2025, June 10, 2025, June 17, 2025, June 24, 2025, July 1, 2025, and July 8, 2025, the latter two of which included compliance information specific to the preliminary injunction issued by this Court on June 18, 2025 regarding the Department's Office for Civil Rights (the "OCR Order"). I further submitted declarations in this case regarding the OCR Order on July 15 and July 22, 2025. I incorporate herein by reference the statements made in my previous declarations. Due to the stay ordered by the United States Supreme Court issued on July 14, 2025, in the aforementioned *New York* and *Somerville* cases, this declaration addresses compliance activities specific to the OCR Order.

6. Senior officials from the ad hoc committee described in my earlier declarations held discussions on July 28 addressing OCR-specific reintegration activities. By July 29, 2025, the Department had:
 - Prepared for August 1, 2025, separation of employment for employees who received RIF notices on March 11, 2025, while ensuring that reintegration plans continue to be implemented as to OCR employees who received RIF notices on March 11, 2025.
 - Confirmed regarding regional office space:
 - Sufficient space exists to return OCR employees in-person to the Dallas Regional Office.
 - Space is insufficient to return OCR employees to in-person work in Boston, Philadelphia, and San Francisco.
 - The Chicago Regional Office still needs to be inventoried to determine if space exists for the return of OCR employees in-person.
 - The New York Regional Office continues to be under renovation until November 2025.
 - The Cleveland office space was returned to GSA.
 - Continued the process of IT restoration and updating as to government furnished equipment (GFE) for OCR employees, including anticipated needs for a substantial number of employees to work remotely until or unless additional regional office space can be secured.
 - Discussed the feasibility and efficiency of returning employees to active duty status based on location and in-person versus remote status, in terms of IT and operational integration into existing OCR team structures.
 - Clarified as to the voluntary resignation inquiries of three OCR employees that such resignations cannot be deemed “involuntary” under a RIF (which would entitle the employees to severance payments) due to the preliminary injunction in this case.
 - Continued to pay the salaries and benefits of OCR employees who received RIF notices on March 11, 2025, and have been on paid administrative leave since March 21, 2025, at a cost to the Department of nearly \$1 million per week.
 - Ensured that OCR continues to process, investigate, and resolve complaints:
 - From March 11 to July 21, 2025, OCR received 6,220 complaints; opened 361 for investigation; opened 27 directed investigations; dismissed 4,334 complaints consistent with OCR’s Case Processing Manual; resolved 107 complaints after investigation concluded insufficient evidence for findings; and resolved 348 complaints with voluntary agreements, OCR-mediated settlements, or technical assistance from OCR to ensure a recipient’s digital resources are accessible to students with disabilities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC this 29th day of July.



Rachel Oglesby